

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

ROBERT ALLEN BAUTISTA,	§	
Plaintiff,	§	
	§	
v.	§	
SANTANDER CONSUMER USA, AUDI	§	Case No. 3:24-cv-02935-K
HENDERSON, EQUIFAX INC.,	§	
EXPERIAN CORPORATION, and	§	
TRANSUNION,	§	
Defendants.	§	

**DEFENDANT TRANS UNION LLC’S  
MOTION TO DISMISS PLAINTIFF’S AMENDED COMPLAINT**

Defendant Trans Union LLC (“Trans Union”), incorrectly named TransUnion, by and through its counsel, files this Motion to Dismiss Plaintiff’s Amended Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and asks the Court to dismiss this matter in its entirety, with prejudice. Trans Union contemporaneously files its Brief in Support of this Motion and incorporates it herein by reference for all purposes.

WHEREFORE, PREMISES CONSIDERED, Defendant Trans Union LLC respectfully requests that this Honorable Court dismiss Plaintiff’s Complaint pursuant to Rule 12(b)(6) for failure to state a claim upon which relief can be granted, with prejudice, and for such other relief as the Court deems necessary.

Respectfully submitted,

*/s/ Heliane Fabian*

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 5th day of December 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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